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without notifying party that it repudiated said agreement. Held, that the company did not have a warehouseman's lien for storage.

Real Estate Agent—Commission.—*Moses v. Helmke*, 41 N. Y. Supp. 557. A real estate broker is entitled to his commission provided he arranged for a sale satisfactory to his principal, although his principal later refused to consummate the sale and sold the property to other parties.

MISCELLANEOUS.

Monopolies—Combination of Patent Owners.—*National Harrow Co. v. Hench*, 76 Fed. Rep. 667, Circuit Court, E. D. Penn. A combination of patent owners, by which each manufacturer assigns to a corporation organized for the purpose the legal title to his patents and receives back an exclusive license to make and sell only the same style of articles as before, all parties being bound to sell at the same prices and on the same terms, is as much a monopoly as any other such combination.

Chinese Labor—What Constitutes.—*United States v. Sun*, 79 Fed. Rep. 450. That a Chinaman, member of a trading firm in which he had an interest, lived with some of the partners at their store and did housework for them, makes him a domestic servant and not a "laborer" for hire, and hence not liable to deportation under registration and deportation acts of 1892 and 1893.

Federal Jurisdiction—State Taxation of National Bank Stock—Injunction.—*Third Nat. Bank of Pittsburg v. Mylin, Auditor-General et al.*, 76 Fed. Rep. 385. Where a tax is sought to be levied against a national bank by State officers claiming under a State statute which is violative of the Fourteenth Amendment and of Sec. 5219 of the Revised Statutes of United States, a Federal court has jurisdiction to issue an injunction against such officers enforcing such tax.

Federal Courts—Following State Decisions.—*Ryan v. Staples*, 76 Fed. Rep. 721, Circuit Court of Appeals (Col.). A single decision by the highest court of a State declaring a judgment void and based on the principles of the common law and not on the construction of any statute, does not establish a rule of property